Hi Luda,

In reviewing the question the POHA has about the permit evaluation process and dredged sediment disposal options, it appears as though the POHA is using the TCDD concentration to compare to the comparison values rather than the TEQ concentration. Upon further evaluation, I noticed that the conditions of determination, as outlined in Section II.A.5 of the Public Announcement, use 33 ppt <u>TCDD</u> organic carbon normalized and 0.45 ppt <u>TCDD</u> non-organic carbon normalized. This was not the original intent of the potential screening values developed by the TD and provided to the EPA for consideration.

The potential screening values developed by the TD used the TCDD BSAF as a conservative method to develop the screening value. However, as stated in my July 23, 2009 email (attached) to EPA and TCEQ project members, ".the TD believe comparison of the oc-normalized sample **TEQ** to the screening criterion of 33 ppt ng/kg-oc for 2,3,7,8-TCDD is likely protective for the sediment-to-fish ingestion human exposure pathway." I also stated ".the **use of a 2,3,7,8-TCDD number is appropriate when no TEQ is available**."

In the real world example given by the POHA, the TEQ is 0.678 ppt; I am going to assume this is non-organic carbon normalized based on the non-organic carbon normalized TCDD concentration given. Therefore, if the potential screening values provided by TD were used as TD intended and explained, the following would be true:

<u>Non-organic carbon normalized</u>
TEQ non-organic carbon normalized = **0.678 ppt, which is greater than 0.45 ppt = Condition #2**, disposal in a hazardous waste landfill or upland confined disposal area

<u>Organic carbon normalized</u>
TEQ non-organic carbon normalized 0.678 ppt / 0.00336 (percent organic carbon) = **201.8 ppt organic carbon normalized, which is greater than 33 ppt = Condition #2**, disposal in a hazardous waste landfill or upland confined disposal area

Also, as discussed in the provided email, please keep in mind that the potential screening value developed by the TD, which was based off of the TMDL data, was 33 ppt organic carbon normalized. It was requested that the TD also provide a non-organic carbon normalized potential screening value. To accomplish this the TD back-calculated the 33 ppt ng/kg-oc using an average TOC of 1.35% (from the TMDL data) for the HSC. This calculation gives the 0.45 ppt non-organic carbon normalized value.

non-oc-normalized potential screening value = (33 ppt ng/kg-oc) * (0.0135) = 0.45 ppt

The non-organic carbon normalized potential screening value of 0.45 ppt provided by the TD is a default value based on an average %TOC for the HSC. *If the %TOC is known for a specific area, then site-specific %TOC would be better for the calculation of the non-organic carbon normalized value.*

<u>Site-specific for the real world example given by the POHA:</u>
non-oc-normalized potential screening value = (33 ppt ng/kg-oc) * (0.00336) = **0.11 ppt**

<u>Therefore</u>
TEQ non-organic carbon normalized = **0.678 ppt, which is greater than 0.11 ppt (based on site-specific %TOC) = Condition #2**, disposal in a hazardous waste landfill or upland confined disposal area

Please let me know if you have any questions.

Tracie

*Please note my email address has changed to <u>tracie.phillips@tceq.texas.gov</u>

_____

Tracie Phillips, Ph.D. | **Senior Toxicologist** | **TCEQ**
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>>> Luda Voskov 7/29/2011 4:23 PM >>>

Tracie, Sue
please let me know if you have any comments on this request.

Thanks!
Luda Voskov, P.G., Project Manager
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>>> Stephen Tzhone <Tzhone.Stephen@epamail.epa.gov> 7/29/2011 12:05 PM >>>
Phil, Jon,

See next email and question from POHA. Any recommendations? If necessary, we can amend the original risk assessor rationale memo and subsequent permits policy with USACE and TCEQ as well.

Thanks,

Stephen L. Tzhone
Superfund Remedial Project Manager
USEPA Region 6 (6SF-RA)
214.665.8409
tzhone.stephen@epa.gov

From:	Nicole Hausler <NCass@poha.com>
To:	Stephen Ellis <STellis@tceq.state.tx.us>, Stephen Tzhone/R6/USEPA/US@EPA
Cc:	Garyg Miller/R6/USEPA/US@EPA, Dana Blume <dblume@poha.com>
Date:	07/29/2011 11:17 AM
Subject:	Port of Houston Authority request for clarification regarding dioxin public announcement

Stephen and Stephen,

Please find attached a letter from PHA requesting clarification on the October 2009 Joint

Agency dredged sediment disposal options public announcement.

I look forward to your response.

Thank you,

Nicole

Nicole D. Hausler
Senior Compliance Coordinator
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